



APPENDIX

APPENDIX A

SUPREME COURT OF ILLINOIS

SUPREME COURT BUILDING

200 East Capitol Avenue

SPRINGFIELD, ILLINOIS 62701-1721

(217) 782-2035

FIRST DISTRICT OFFICE

160 North LaSalle Street,

20th Floor Chicago,

IL 60601-3103

(312) 793-1332

TDD: (312) 793-6185

July 24, 2025

In re: In re Marriage of Sebastin Francis, respondent, and Sossamma George

Sebastin, petitioner. Leave to appeal, Appellate Court, Second District. 131990

The Supreme Court today DENIED the Petition for Leave to Appeal in the above entitled cause. The mandate of this Court will issue to the Appellate Court on 08/28/2025.

Very truly yours,

/s/ Cynthia A. Grant

Clerk of the Supreme Court

APPENDIX B

ILLINOIS APPELLATE COURT

SECOND DISTRICT

55 Symphony Way

Elgin, IL 60120

(847) 695-3750

May 27, 2025

Sossamma George-Sebastin

13268 West Heiden Circle

Lake Bluff, IL 60044

RE: IRMO: Francis, Sebastin & George, Sossamma

Appeal No.: 2-25-0139 County: Lake County Trial Court No.: 20D905

The court has this day, May 27, 2025, entered the following order in the above entitled case: Appellant's motion to reconsider is denied.

/s/ Jeffrey H. Kaplan

Jeffrey H. Kaplan

Clerk of the Court

cc: Myra Ann Foutris

APPENDIX C

ILLINOIS APPELLATE COURT

SECOND DISTRICT

55 Symphony Way

Elgin, IL 60120

(847) 695-3750

April 30, 2025

Myra Ann Foutris

Foutris Law Office, Ltd.

53 W. Jackson, Suite 352

Chicago, IL 60604

RE: [RMO: Francis, Sebastin & George, Sossamma

Appeal No.: 2-25-0139

County: Lake County

Trial Court No.: 20D905

The court has this day, April 30: 2025, entered the following order in the above
entitled case:

Petitioner's motion to dismiss respondent's appeal for lack of jurisdiction is granted.

We note that this is the fourth appeal of the respondent's-all pertaining to the dissolution of her marriage to the petitioner-that we have considered since December 2024. Three of those appeals have been dismissed, at least in part, for lack of jurisdiction. "Appeals are a serious matter which consumes the time and attention of both this court and the other litigants ." *Venzor v. Carmen 's Pizza Corp.*, 235 Ill. App. 3d 1053, 1059 (1992). We admonish respondent to comply with all Supreme Court Rules and Rules of this Court. Her failure to do so may result in her being barred from filing any more appeals in this court without our approval and/or being obligated to pay the attorney fees and costs petitioner incurs in defending against an appeal over which we lack jurisdiction.

THIS ORDER IS FINAL AND SHALL STAND AS THE MANDATE OF THE COURT.

(Schostok, Birkett, Mullen, JJ.)

/s/ Jeffrey H. Kaplan

Jeffrey H. Kaplan

Clerk of the Court

CC: Lake County Circuit Court

Sossamma George-Sebastin

APPENDIX D

Erin Cartwright Weinstein

FILED

Clerk of the court

03/19/2025 3:37 PM

Lake County, Illinois

20D 00000905

IN THE CIRCUIT COURT OF THE NINETEENTH JUDICIAL CIRCUIT LAKE
COUNTY, ILLINOIS

IN RE: THE MARRIAGE OF)

SEBASTIN FRANCIS,)

Petitioner,) Case No: 2020 D 905

And)

SOSSAMMA GEORGE SEBASTIN,))

Respondent.)

ORDER

THIS MATTER coming before the Court by for hearing on the following
pleadings: 1. Sossamma's Amended Motion to Receive Dr. Finn's Report, All Test
Results and Subpoena Material filed 7/18/24 originally and amended filed 12/26/24;
2. Sossamma's Petition to Rule to Show Cause for Extracurricular Related Order -
(July 16, 2024 Order) filed 12/2/24;

3.Sossamma's Petition to Rule to Show Cause for Medical Order- (July 16, 2024 Order) filed 12/2/24;

4.Sossamma's Petition to Rule to Show Cause for Children's Travel Related Order - (July 16, 2024 Order) filed 12/2/24;

5.Sossamma's Petition to Rule to Show Cause for Messaging Services (July 16, 2024 Order) filed 12/2/24;

6.Sossamma's Emergency Motion to Correct Court's Ruling and Vacate Order from Dec 4, 2024 filed 12/6/24;

7.Sossamma's Petition for Rule to Show Cause and for Other Relief- Debt Payment (July 16, 2024 Order) filed 12/26/24;

8.Sossamma's Amended Emergency Petition to Rule for Show Cause (Dec 11, 2024 Order) and Other Relief filed 1/3/25;

9.Sebastin's Motion for Sanctions filed on 1/3/25;

10.Sossamma's Motion to Correct Child Support and Other Financial Related Errors filed 1/7/25; and

11.Sossamma's Motion for Sanctions filed on 1/8/25.

And presentment or status of the Sebastin's Motion to Reconsider the November 12 and 14 Court Order and Sossamma's Motion to Correct Withholding Order and Reconsider/Vacate Court Order from November 12 and 14; and Sossamma's Motion to Reconsider (other's) Attorney Fees filed on 2/10/25.

The Petitioner present along with his counsel, and the Respondent present and representing herself pro se, and the court hearing argument and being fully advised in the premises;

IT IS so ORDERED:

Due to the high number of motions pending, both parties must seek court permission before filing ANY new motion.

1. Sossamma had 10 motions scheduled for hearing and 2 motions scheduled for status. The requirement of permission before filing any more motions was issued Sua Sponte by the Court. A party must file a notice of motion with the caption reading "asking permission of the court to file a motion" with a short-one paragraph-summary of the motion but NOT the motion itself. The party must contact the clerk to get a court date for presentation.

2. Sossamma's Amended Motion to Receive Dr. Finn's Report, All Test Results and Subpoena Material, originally filed on 7/18/2024 and later amended on 12/26/2024, is denied and the Court has prepared a separate order regarding this issue.

3. Sossamma's Petition for Rule to Show Cause for Extracurricular Related Order- (July 16, 2024 Order) filed 12/2/24 is denied, because the court cannot set a purge to "not do something again". However, the Court admonished Sebastin to follow the court order. If Sebastin does not follow the medical notification and consultation sections in the Judgment, the Court will consider not requiring Sossamma to pay her share of incurred medical expenses for the children.

4. The Court further Ordered that Sossamma will have no financial responsibility for the swimming lessons and any money Sebastin received for Sossamma shall be returned via separate check within 1 working day. In the future, Sossamma will have no responsibility for an extracurricular activity if Sebastin he has not notified, consulted and considered her input pursuant to paragraph 1.6 of the Allocation Judgment.

5. Sossamma's Petition to Rule to Show Cause for Medical Order - (July 16, 2024 Order) filed 12/2/24 is denied, because the court cannot set a purge to "not do something again". However, the Court admonished Sebastin to follow the court order.

6. Sossamma's Petition to Rule to Show Cause for Children's Travel Related Order - (July 16, 2024 Order) filed 12/2/24 is denied. The Court found the Judgment of Dissolution of Marriage refers to vacations as requiring notice to the other party. The Court finds it is necessary to include this additional language to ensure full notification if the children are taken out of state for ANY reason.

7. The Court further Ordered that the parties are required to notify the other party if they are taking the children out of state overnight and they are required to notify the other party of the dates, address where they are staying and telephone number if they are staying at the hotel, Air B & B or other location, including family member's houses.

8. Sossamma's Petition for Rule to Show Cause and for Other Relief - Debt Payment (July 16, 2024 Order) filed 12/26/24 is denied. The Court finds that

Sebastin did contact the creditors within two weeks as required and that there is no deadline for payment of the debt. Further the court acknowledged that Sebastin does not have adequate liquidity to pay the debt in full. The issue of finances as required in the Judgment for Dissolution will be decided 30 days after the final judgment is entered, which will not occur until 30 days after all pending motions are resolved. Neither party should interpret the Court's ruling to mean they do not have to carry out the financial requirements of the Judgment of Dissolution, but just that their enforcement must be stayed until all pending motions are resolved and any and all appeals are resolved.

9. The Qualified Domestic Relations Order required by paragraph 51 of the Judgment dated July 16, 2024, is stayed until 30 days after final judgment which will not occur until 30 days after all pending pleadings are resolved.

10. Sebastin's Motion for Sanctions filed on 1/3/25 is denied, because there is no proof that Sossamma used AI. Both parties shall attach a copy of all caselaw cited in pleadings to that pleading going forward.

11. This matter is set for hearing on July 14, 2025 at 1:30 p.m. in C402 via zoom or in person the following pleadings:

A. Sossamma's Petition to Rule to Show Cause for Messaging Services (July 16, 2024 Order) filed 12/2/24;

B. Sossamma's Emergency Motion to Con-ect Court's Ruling and Vacate Order from Dec 4, 2024 filed 12/6/24;

- C. Sossamma's Petition for Rule to Show Cause and for Other Relief- Debt Payment (July 16, 2024 Order) filed 12/26/24;
- D. Sossamma's Amended Emergency Petition to Rule for Show Cause (Dec 11, 2024 Order) and Other Relief filed 1/3/25;
- E. Sebastin's Motion for Sanctions filed on 1/3/25;
- F. Sossamma's Motion to Correct Child Support and Other Financial Related Errors filed 1/7/25;
- G. Sossamma's Motion for Sanctions filed on 1/8/25;
- H. Sebastin's Motion to Reconsider the November 12 and 14 Court Order;
- I. Sossamma's Motion to Correct Withholding Order and Reconsider/Vacate Court Order from November 12 and 14; and
- J. Sossamma's Motion to Reconsider (other's) Attorney Fees filed on 2/10/25.

ENTERED:

Dated: March 17, 2025

/s/Rhonda K. Bruno

JUDGE

Michone J. Riewer/6231058

Strategic Divorce, LLC

900 North Shore Drive, Suite 220

Lake Bluff, IL 60045

Attorney for Petitioner: service@strategicdivorce.com

Respondent: sossammag@yahoo.com

APPENDIX E

Erin Cartwright Weinstein

FILED

Circuit Clerk

MAR 17 2025

Lake County, Illinois

20D 00000905

IN THE CIRCUIT COURT OF THE NINETEENTH JUDICIAL CIRCUIT LAKE
COUNTY, ILLINOIS

IN RE: THE FORMER MARRIAGE OF)

SEBASTIN FRANCIS)

Petitioner, AND) No. 20D 905

SOSSAMMA GEORGE SEBASTIN)

Respondent.)

ORDER

This matter comes before the court on Respondent's amended motion to receive the report of Dr. David Finn, the court-appointed section 604.10(b) evaluator. Having reviewed the record, statutory authority and case law and being fully advised, the court now finds as follows:

The parties were married in 2007 and had two children: R.S. born in 2008 and A.S. born in 2017. In July 2020, Petitioner filed a petition for dissolution of his marriage to Respondent. The court appointed Dr. David Finn to conduct an evaluation pursuant to section 604.10(b) of the Illinois Marriage and Dissolution of Marriage Act (750 ILCS 5/604.10(b)).

In November 2023, Dr. Finn produced his report, which was provided only to the court and counsel, but not directly to the parties. Dr. Finn concluded that Respondent fit the characteristics of Munchausen by Proxy for keeping R.S. in perpetual state of illness, and that Respondent posed a substantial and serious danger to her children. Dr. Finn recommended that, to protect the safety of the children, his report should not be distributed directly to the parties.

At that time, Respondent was represented by counsel. Respondent changed attorneys twice after Dr. Finn provided his report. All three of Respondent's attorneys reviewed the report with Respondent. Dr. Finn also testified extensively about his report during the seven-day trial on the petition for dissolution in June 2024. Three days after closing arguments, Respondent's seventh attorney withdrew as counsel and Respondent subsequently filed her pro se appearance.

On July 16, 2024, this court entered a dissolution of judgment and an allocation of parental responsibilities and parenting plan judgment. Several days later Respondent filed her original motion to receive Dr. Finn's report, which the trial court did not rule on.

Both parties appealed the trial court orders. In her appeal, Respondent argued that the trial court improperly withheld Dr. Finn's report from her now that she represented herself. The appellate court found that because the trial court never ruled on Respondent's motion, this issue was not appealable or, in the alternative, was forfeited on appeal. In re Marriage of SF and SGS, 2024 IL App (2d) 240440-U, ¶ 57.

In December 2024, Respondent filed an amended motion to receive Dr. Finn's report. Section 604.10(b) permits the professional to send a copy of the report to counsel for the parties. Respondent argues that, because she is representing herself post-judgment, she is entitled to a copy of the 604.10(b) report.

Section 604.10(b) allows a court to seek the advice of any professional to assist the court in determining a child's best interest. It states that the professional's advice shall be sent to the court and to counsel for the parties "not less than 60 days before the date on which the trial court reasonably anticipates the hearing on the allocation of parental responsibilities will commence." 750 ILCS 5/604.10(b). The section permits the report to be admitted into evidence and the professional to testify. Id.

Based on this language, the statute clearly contemplates that the professional's report function as a pre-trial tool to assist the court in its determination of parental responsibilities between the parties. And the report in this case was used in this manner - this court relied upon Dr. Finn's 604.10(b) report to craft the parenting responsibilities set forth in the allocation judgment.

Merely because Respondent chose to represent herself after the court entered judgment does not now entitle her to obtain a copy of Dr. Finn's report. Section 604.10(b) contains no provision for distribution of the professional's report post-judgment. Nor has Respondent provided - and the court has not found - case law that supports Respondent's position.

Moreover, Respondent will not suffer prejudice from not receiving the report post-judgment. As section 604.10(b) requires, Dr. Finn's report was sent to Respondent's counsel and to the court within the appropriate time frame. Each of Respondent's prior attorneys reviewed this 604.10(b) report with her before trial. Dr. Finn then testified in detail about his findings during the trial. Respondent cannot claim that Dr. Finn's reasoning and conclusions are unknown to her.

Lastly and most significantly, Dr. Finn recommended that, to protect the safety of the children, the report not be distributed to the parties. The court's detailed knowledge of the facts of this case coincides with Dr. Finn's recommendation. The continued safety of Respondent's children is, and will continue to be, this court's utmost concern.

For the reasons stated above, Respondent's amended motion is denied.

ENTERED:

/s/Rhonda K. Bruno

Judge Rhonda K. Bruno

IN RE THE MARRIAGE OF:)
)
SEBASTIAN FRANCIS)
) No. 20D 905
Petitioner, and)
)
SOSSAMMA GEORGE)
)
Respondent.)

TEMPORARY ORDER OF ALLOCATION OF PARENTAL RESPONSIBILITIES

This Matter coming before this Court for status of Dr. Finn's report pursuant to court order and pre-trial, said report being disseminated to both attorneys but not their clients pursuant to Dr. Finn's recommendation and pursuant to the limitations in 750 ILCS 604.1 O(b) based on concerns for the safety of the minor children, and upon the Court's judicial notice of the entire record of these proceedings, including the Court's ability to hear in-person testimony from both Petitioner and Respondent on multiple occasions in prior proceedings, both Petitioner and Respondent being present in open court with counsel, counsel for Petitioner having filed her Emergency Motion on a previous occasion to remove the children from Respondent's care and then filing another Emergency Motion to terminate parenting time & emergency petition for order of protection today's date, counsel for both sides being able to argue said motion, other reasons stated on the record, the Court finds as follows:

1. The Court has jurisdiction over the parties and subject matter and venue are proper.
2. The matter is set for trial on multiple issues including the allocation of parental responsibilities on May 13, 2024.
3. Petitioner has set forth a credible, Prima facie case of serious and on-going endangerment of both minor children, R [REDACTED] and A [REDACTED] when in the care of Respondent. The Court has considered and discussed with the parties the pre-trial memorandum submitted by their respective counsels on November 7, 2023 by Mr. Douglas of Douglas Law on behalf of Respondent and on November 6, 2023 by Ms.

Riewer and Ms. Wu of Strategic Divorce on behalf of Petitioner. The Court finds this to be an emergency of the utmost gravity and finds it necessary to act in the best interests of the minor children.

4. Notwithstanding the impending trial, the court finds it is in the best interest of the children to enter a temporary order regarding parental responsibilities. This is based on the information available to the Court at this time, which consists of the 604.10(b) report, Dr. Finn appearing in court via Zoom, current report and previous reports of the GAL, observations of the parties and prior orders. It should also be noted that the Court finds that Petitioner has failed to follow court orders in the past, ignored the advice of medical and therapeutic professionals and the court is concerned she will not follow orders of the court to safely deliver the children and not discuss the litigation with them.

5. The GAL, Caryn Barone, and the 604.10 (b) evaluator, Dr Finn, both concur in said assessment and opine that immediate action for the safety of both children is necessary. Dr. Finn issued a 33-page report on November 14, 2023, which recommends immediate transition of the children to Petitioner and no contact of any kind with Respondent until certain other conditions are met, such as therapy for Respondent and the children.

6. 750 ILCS 5/603.10(a) is a two step process pursuant to *In re the marriage of Mayes*, 109 N.E. 2d 942, 424 Ill. Dec. 828 (4th Dist. 2018). The trial court must first determine if the evidence showed the parent engaged in conduct that seriously endangers a child's mental, moral or physical health or significantly impacts the

child's emotional development. Once the court makes said finding, it must enter an order that is necessary to protect the child. Notwithstanding the future trial on the merits, the court does find that 1st Respondent has engaged in a knowing and intentional course of conduct over an extended period of a year that has seriously endangered the minor children's physical, moral and emotional health and has significantly and negatively impacted their emotional development. Secondly, the Court finds it necessary to enter the current order to protect the minor children pursuant to 603.10(a). It must also be noted that the Court has been involved with this case and the parties for over 10 months and has had numerous court dates, both remote and in person, with the parties and their attorneys, although their attorneys have changed over time. The court has had ample time to observe the parties, assess their credibility, observe their demeanor, listen to extensive reports from the GAL, rule on several emergency motions and enter an order awarding Petitioner sole decision making regarding health care for R [REDACTED] on December 20, 2022. The Court listened to arguments by both counsels regarding the Court's actions and proposed order and notes this order is over strong objections by Respondent's counsel, both to the nature of the hearing and the order itself. The Court notes that based on the GAL's recommendations and Dr. Finn's report it has no choice but to act in this fashion to protect the minor children and stop future harm to the children at the hands of Respondent.

7. It should also be noted that pursuant to Dr. Finn's strong recommendations regarding the dissemination of his report as contained on page 31 of his report, this

report will be kept under seal and has not been disseminated to counsel for the parties until today's date, November 17, 2023, and that counsel for the parties have not been privy to the courts' recommendations or this order until today's date, November 17, 2023, again at the strong urging of Dr. Finn to protect the children as much as possible.

8. On a temporary basis and by a preponderance of the evidence available to the Court in prior and the pending proceedings, but without prejudice to the final trial on the merits for a permanent allocation of parental responsibility, the Court finds the Respondent has engaged in knowing conduct that seriously endangered and continues to endanger the minor children's physical and mental health and has significantly impaired, and continues to impair, their emotional development. It should be noted that on a prior occasion and memorialized by an order of this Court on December 20, 2022, the Court found Respondent had seriously endangered R [REDACTED] and awarded sole medical decision-making regarding health care to Petitioner for R [REDACTED].

9. On a temporary basis and by a preponderance of the evidence available to the court in prior and the pending proceeding, but without prejudice during the trial on the merits for a permanent allocation of parental responsibility, good cause exists to believe the minor children's mental, physical and emotional well-being will continue to be seriously harmed and damaged and endangered if left in the care, custody and control of Respondent. Thus it is necessary, under 750 ILCS 5/603.10(a) to place restrictions on Respondent's parental responsibilities on an emergency and

temporary basis. The Court has conducted a brief hearing and finds by a preponderance of the evidence that Respondent has engaged in conduct that seriously endangers the children's mental, moral and physical health and has significantly impaired the children's emotional development.

10. On a temporary basis, and by a preponderance of the evidence available to the court in prior and the pending proceeding, but without prejudice to the trial on the merits for a permanent allocation of parental responsibility, good cause exists to believe the minor children's mental, physical and emotional well-being will continue to be significantly impaired unless contact with Respondent is stopped in its entirety, and then re-started at the appropriate time, under close therapeutic supervision with appropriate controls and safeguards in place.

11. It is in the immediate but temporary best interests of the minor children of the court to enter a temporary order on allocation of parental responsibilities to protect the minor children from serious and continuing harm. This order is over the objections of Respondent's counsel.

THEREFORE, in light of the foregoing findings and for additional reasons stated on the record, the Court orders as follows:

A. All parenting time is awarded to the Petitioner on a temporary basis until further order of court.

B. Petitioner's home shall be the primary residence of minor children, unless one of the minor children is in residential placement.

- C. Petitioner is awarded sole decision-making for the minor children for healthcare for both children (Petitioner was previously awarded sole healthcare decision making re R■■■■, but not A■■■■ on December 20, 2022,) education, religion and extra-curricular activities on a temporary basis.
- D. R■■■■ shall be seen by her pediatrician within 72 hours of the transition to Petitioner's care and shall continue to be assessed for the next 8 weeks post transition. Following the 8 weeks, R■■■■ shall be assessed by her pediatrician once a month for the next 10 months unless the pediatrician recommends an alternative frequency for said visits.
- E. R■■■■ should meet with her school counselor or social worker at least once per week.
- F. Every effort shall be made to have R■■■■ remain at Libertyville High School based on her psychological and emotional stability. If she cannot be safely kept in this environment, she shall be placed in a therapeutic residential school.
- G. Petitioner shall enroll Asher with a therapist within 7 days of the transition to his care.
- H. Both minor children shall attend therapy at the frequency and duration suggested by their therapists.
- I. Respondent shall enroll in therapy with Dr. Chinni Chilamkurti (847-744-8064). After a minimum of 26 sessions with Dr. Chinni, Respondent should submit to a limited scope update of Dr. Finn's evaluation to determine if any type of

parenting time, beginning with therapeutic reunification, is recommended as being in the best interest of the children.

J. Respondent can write short cards or letters (no more than one-page letters) to the children assuring them of her love, but not mentioning the litigation in any way, or her wish to see them or that she misses them. Those cards and letters should be sent to the children's therapist, NOT the children, and the therapists shall determine if, after reviewing them, they are appropriate to share with children. The children may elect to write back to Respondent and email said notes to her.

K. Petitioner and Respondent shall immediately contact Pamela Rak LCSW, (847-776-1594) and begin working with her regarding messaging to the children.

L. All parties shall sign all releases necessary so that Ms. Rak can be consulted by the children's therapists on communication between the children and Respondent. If the Court deems it appropriate, Ms. Rak's role may be expanded at a later date to include parenting coordination.

M. Both parents will sign any releases necessary to allow any and all providers to speak to each other as well as to the GAL. Respondent shall not, until further order of court, have ANY communication with any treatment provider or school official including, but not limited to, counselors, social workers, teachers, coaches and administrative staff, via email, text, phone, personal contact or any other communication method. Neither attorney for either party may communicate with any treatment provider, but instead shall raise any issues, questions or concerns with the GAL, who may then, at her discretion, contact said provider.

N. Pursuant to *In re Marriage of Stein*, 2015 Ill.App 2d (2nd. 2015) and *Johnston v. Weil*, 946 N.E. 2d 329, 349 Ill .Dec 135 (2011) section 604.10(b) strictly limits disclosure of said report to the court and the parties' attorneys. Therefore, the parties are prohibited from disclosing Dr. Finn's report to ANY treatment provider, school counselor, school social worker or any other person. Further, neither attorney may disclose or show or give a copy of said report to their client but may discuss the contents with their client.

O. Petitioner shall ensure both children are engaged in a sustained course of treatment, therapy and continuing care by licensed mental health professionals. Petitioner shall share all his decisions with Respondent on OFW, with the understanding that he has sole decision-making and at least on a temporary basis, no need to consult with her regarding his decisions. It is anticipated that this prohibition may change at the trial on the merits of allocation of parental responsibilities but is necessary now, based on Respondent's past interaction with treatment providers and disagreements with Petitioner.

P. Petitioner shall pick up R [REDACTED] from Libertyville High School by 3:30pm today, November 17, 2023., and A [REDACTED] from Oak Grove School or his assignees as well on today's date at the end of his school day. Respondent shall have no contact of any kind with either children from today's date, whether by phone, text, email, social media, third parties or in person until further order of court except as provided in section J. Respondent shall not download and use any applications that erase or otherwise hide messages after sending. The Court has ordered said transfer

in this fashion based on the report and recommendations of Dr. Finn and the GAL, consultations with counsel for the parties. Further the court believes that the plan recommended by Dr. Finn in his report, namely to have Respondent drive R [REDACTED] to the hospital and have the GAL explain to her she was going with her father, the Petitioner, would not have worked as the court does not trust Respondent not to discuss the litigation with R [REDACTED] or to deliver her to the hospital and leave, as Dr. Finn recommended.

Q. Petitioner shall hire an overnight caregiver to ensure R [REDACTED] does not attempt to harm herself or leave the house. R [REDACTED] is not to be left alone in the house at ANY time for ANY reason.

R. R [REDACTED] shall have an appointment with her therapist as soon as possible following the transition.

S. Petitioner shall ensure his house to the fullest extent possible does not have any instruments R [REDACTED] could use for self-harm including but not limited to, knives, bleach and other similar caustic compounds, rope, tools, gardening implements, medication of any kind, whether prescribed or over the counter (any medication currently prescribed to R [REDACTED] shall be administered to her by Petitioner), gas or other compounds used in cars and motorized vehicles.

T. Petitioner may place R [REDACTED] in a residential treatment facility if he feels it is necessary for her safety and as recommended by a treatment provider. He shall so inform Respondent, who will NOT communicate with said facility in ANY fashion, nor speak to R [REDACTED] either in person, via phone, email, text, social media or any

other communication application or through a third party or visit her at said placement until further order of court.

U. During the pendency of this Order, no modifications shall be made without prior approval of the court, including but not limited to communication in any form or parenting time by Respondent with the children.

V. This report shall be placed under seal and shall NOT be given to either party, although the Court recognizes and acknowledges the attorneys will need to discuss the report with their clients. Neither party shall discuss the report or any of the litigation with the minor children.

W. Failure to comply with this order or any part thereof will result in contempt proceedings.

TEMPORARY NATURE OF THE ORDER AND STATUS HEARING

X. This order is temporary in nature and shall be entered without prejudice to either party.

Y. This matter is scheduled for an in-person status hearing relating to any issues arising out of this order on 12/20/23, 2023 in C-105 at 1:30pm.

Dated this 17th day of November 2023 at Waukegan, Illinois.

ENTER:

/s/ Rhonda K. Bruno

Judge Rhonda Kind Bruno

APPENDIX G

**R.S' Note - Excerpt from petition for rule to show cause and for other relief
- Oct 6, 2022 order**

Exhibit B

----- Forwarded Message -----

From: "R [REDACTED] S [REDACTED]" [REDACTED]

To: "sossammag@yahoo.com" <sossammag@yahoo.com>

Sent: Tue, Apr 23, 2024 at 11:16 AM

Subject: Hi it's R [REDACTED]. Please listen,

on November 17, 2023 when the GAL showed up at my school, I was really scared. I had a really bad panic attack after they told me I can't see my mom and I have to live with my dad. I was really upset that I couldn't see my mom and I kept asking them why. they kept saying that they don't think it's good for me to know right now considering my state of mind. I kept telling them keeping me in the dark would make me feel worse. They told me that it would not be good for me to be with my mom right now and basically implied that she was being mentally abusive to me. I kept telling them and crying and begging them and saying that she was not mentally abusive and that, I love her and she does not do any of that stuff to me. they also presented me with the evidence that as soon as I moved into my mom's house by myself, that I started going to hospitals and having mental health issues. I told them that that had nothing to do with her and had everything to do with my

personal mental health and school, and even flashbacks I had of my dad and trauma. I kept asking them if my mom was OK and they said yes physically she is. Then I asked if she was emotionally. OK they said I don't know. We're not your mom. I got really. I got really angry and kept asking that why. They wouldn't give me a straightforward answer, and I was really panicking. I was really really scared and didn't wanna go. I kept asking if I could just go home and trying to prove to them that she is a good mother but they said I had no other choice. They said I had to go home with my dad right now. I can go to the ER and get evaluated.

since I didn't wanna go with my dad, I chose to go to the ER. I wasn't feeling suicidal or the need to harm myself in anyway, but I just didn't want to go with my dad was, I was scared. After going to the ER, I frantically explained what happened at school to one of the ER doctors and begged her to not let my dad see me. She agreed and advised that the best thing for me to do would be to go to the psych ward because I would be safe and have a place to process all the big things that happened. I wasn't too excited because I didn't wanna go home with my dad and was really scared. When I was in the psych ward, I kept pushing to try and go to foster care because I didn't want to go home with my dad. what caused me to finally agree to go home with my dad was the fact that I knew if I went I wouldn't be able to bring my brother or be with him. I didn't like the idea of my brother being alone with my dad because I didn't trust my dad. And I knew that the foster care system wasn't great and people kept warning me about the system. All my mental health

workers there were told the GAL side of the story, about how I was brainwashed into thinking the abuse that happened happened and that it didn't really happen. They were told that it didn't happen since there was apparently no evidence and I had been brainwashed by my mom, which was not true at all. I told my mom that's the only way she found out I told a mental health worker at a hospital when I was 13 before I told anyone else. I agreed to go back home with my dad along that he gave me space, never touched me, and that there would be cameras in the house. They decided that I needed more time to process these big changes in my life and sent me to residential. I wanted to go to a residential in Florida since it would be further from my dad, but my dad canceled my opening in Florida and wanted to send me to Connecticut since it's close to New York and he would be able to visit. I didn't like that and was upset that he canceled the opening, but it was too late to get the opening back so I ended up going to Connecticut. My aunt ended up coming with us on the flight since I wasn't comfortable being alone with my dad. I was told I couldn't have my phone. at Connecticut I worked on stuff mostly communication with my dad and ended up "getting comfortable with him". I didn't really feel comfortable with him. I just created an alternative version of my dad and my mind to protect me from having flashbacks and being scared all the time. I don't think I did this consciously, but more subconsciously as a defense mechanism. The court and everyone who talked bad about my mom including my dad corrupted my happy memories with her and i will never forgive them for that. I don't want her to be sad and really miss her.

I was told that me and my brother couldn't see my mom because she was unwell and needed therapy. After getting out of residential, I found out that my mother had been diagnosed with a mental health illness that I had never heard of before. After researching, I thought that she did not have it and that was absolutely absurd and crazy. I was very upset and tried telling people that she didn't have that and she was an amazing mother. I tried explaining that she never exaggerated my symptoms, but sometimes I was too scared to tell people on my own, so I had her speak for me. A [REDACTED] was told that Mom is sick and that's why he can't see him. He's too young to know. I was told Mom would go to jail if I tried contacting her two times. Th GAL told me that first then my dad reinforced it.

I wasn't told much about the court process and was mostly kept in the dark. When I asked my dad for certain privileges, he said he was asking the court, but after a while, I found out that he was lying about some of that. I found out that some of the rules he had for me wasn't because of the court and was because of him. I knew that the court process was still going on and at first they told me that if my mom did everything she was supposed to that i would see her in five months. then that changed to "i don't know". I was occasionally told that mom isn't doing any of the stuff she's supposed to do in therapy. I was also told that my mom isn't allowed to send me letters about charlie because she's using that to emotionally blackmail me or make me miss them more. That is totally insane and bullshit. Why or how much i

miss my dog isn't going to be easily effected by a letter. I am a strong person. If anything, it made me smile hearing about the cute things charlie would do. I was never told by anyone from the court or my dad that my mom went to the hospital. I was very upset and worried when i found out. it's so unfair that she had her kids taken for her because of some whack jobs that said "yup i 100% know this mother better than her own daughter who's been with her for 15 YEARS". I may not be a professional, but i know a good amount from the mental health facilities i've gone to and my own research i used to do for fun. I also have something called a GUT FEELING and fucking INTUITION. I never had any of these bad feelings about my mom EVER. I started dissociating a lot after coming home with my dad. I was constantly numb and couldn't feel or cry even when i wanted to. I instead got upset over small things bc i couldn't let my sadness or anger out. People think i'm doing much better when really i would love nothing more than to just sleep for the rest of eternity. i literally feel dead inside, like nothing is real i'm i'm already dead somehow. A [REDACTED] doesn't know how to process his feelings and ends up throwing a lot of tantrums. He cries a lot more when he's hurt because he misses mom. He gets very upset when people get mad at him or push him away. He's more shy and quiet now. He's also pretty uptight and hates any type of change. He clings to me a lot more now. I really just wanna go home. Home to mom's house with my brother. I wanna go home and go back to how things were and be a family with mom again. I love my mom so much and really miss everything and my dog and my real home. I was told i can't contact mom and she can't contact me. The only contact i was told i

could have were sending her gifts for her birthday and mother's day and letters necks and forth. I was told she can send a letter once a week. I begged them to let me at least have a phone call with my mom for Christmas but they said no. I didn't even get a letter from her for Christmas. I had no contact with her during Christmas. It was very depressing. I've basically been coping with living with my dad by separating his abusive past from him now to almost create a fantasy like world. To protect my brain from trauma and flashbacks. I didn't do it on purpose but more so it just happened as a defense for myself. I see him as a completely different person as him abused him to help myself. I still know what happened and how he abused me no matter what anyone said. I remembered things all on my own and nobody told me anything about memories i had or "made" me remember things. It was all me.

I still feel uneasy when he touches me and sleep most of the time with my door locked. I am tired and drained a lot now and it's really hard. I just wanna live with my mom again please.

-R [REDACTED] S [REDACTED]

ID: 413830

APPENDIX H

**Letter To The Court From Petitioner's Psychologist: An Excerpt from
Petitioner's motion "Motion to reconsider and modify paragraph I of the
temporary order of allocation of parental responsibilities entered
November 17, 2023"**

Positive Outcomes Consulting

847-845-2092 800 E. NW Highway, Ste. 707, Palatine, IL60074

January 26, 2024

Dear Judge Bruno,

My name is Dr. Lisa Kohut and I'm writing this letter on behalf of my client,
Sossamma George, per my discussion with Attorney Ronald Bell about the
diagnosis and treatment orders given by the court.

Mrs. George has been a client of mine for the past 2 years, since June 21st of 2021
and has been treated for symptoms of trauma and anxiety related to her divorce
and the custody case. Since beginning treatment, she has also lost her father.

According to Attorney Ronald Bell, Mrs. George has allegedly been diagnosed with Munchausen By Proxy by Dr. Finn and has been ordered to receive treatment for this condition with Dr. Chinny.

Your Honor, I'm very uneasy and strongly concerned about this diagnosis and the treatment orders, considering that although, Dr. Finn's office and I made efforts to connect, we never connected and consequently, my clinical impressions were not considered in the findings.

I have been an independently licensed clinical counselor for over 20 years, 9 of those have been in private practice and 13 of those years have been in a therapeutic day school as a School Psychologist, which has allowed me the opportunity to interact with parents who allegedly had symptoms of Munchausen by Proxy. Based on my 2 years of experience with Mrs. George and several years of experience in the mental health field, I would respectfully disagree with the current diagnosis and I'm extremely concerned about the adverse side effects (both short and long term) that this order to be treated for this condition could have on Mrs. George. Mrs. George has already experienced a significant amount of adversity going through the divorce, losing contact with her children, having an Order of protection filed against her and now being given a diagnosis and treatment order that arguably has very little if any support.

EXHIBIT B

My observations and impressions of Mrs. George are that she is a loving, attentive and hard working mother, who has made every effort to address her children's needs as well as her own as they have come up.

For that reason, I'm proposing that the order for Mrs. George to be treated for Munchausen By Proxy by a treating therapist, who she has not developed a rapport with be dismissed and that Mrs. George continue her treatment with me. Mrs. George's symptoms of trauma and anxiety need to continue to be treated.

Thank you in advance for your cooperation regarding this matter and for taking the time to read and understand this request. Please feel free to contact me with any questions or concerns regarding this matter.

Sincerely yours,

/s/ Lisa Kohut

Dr. Lisa Kohut,

Ed.D, Ed.S., LCPC